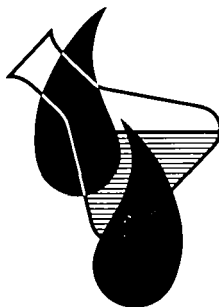


CHEMICAL RECOVERY SYSTEMS, INC.

36345 VAN BORN ROAD
ROMULUS, MICHIGAN 48174
PHONE (313) 326-3100



142 LOCUST STREET
P. O. BOX 375
ELYRIA, OHIO 44035
PHONE (216) 323-3275

US EPA RECORDS CENTER REGION 5



466616

May 9, 1980

U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Sandra S. Gardebring

Ms. Gardebring,

Please find our response to your recent letter requesting information pursuant to Part 308 of the Clean Water Act and Part 114 of the Clean Air Act. As a preface to the data we would like to confirm to your department that we have owned Chemical Recovery Systems since 1974. Prior to that the company was known as Obitts Chemical Company. We can and will provide information from our date of ownership.

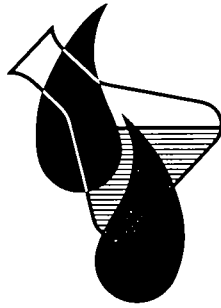
Information as Requested

1. To the best of our knowledge, there has been no statutory requirements in the State of Ohio that demanded that recycling operations specifically list those recoverable streams brought in for processing. However, our standard accounting and quality control procedures would permit the tracking of all products brought to our Elyria operation for recovery. Please find enclosed several gas chromatographs (Items #1) that are typical of those streams which we recover.
2. Since our ownership in 1974, we have limited the recovery operation to that of solvent reclaiming only! We have not intentionally nor do we intend to take any product that does not have recovery value. We do not dispose of any Chemical products on this property.
3. In our recovery operation we generate a waste sludge as a by-product of the operation. These "bottoms" have and still are handled by outside licensed contractors. Following is a list of those contractors and waste processors who have handled these "bottoms" since 1974:

CHEMICAL RECOVERY SYSTEMS, INC.

36345 VAN BORN ROAD
ROMULUS, MICHIGAN 48174
PHONE (313) 326-3100

142 LOCUST STREET
P. O. BOX 375
ELYRIA, OHIO 44035
PHONE (216) 323-3275



-2-

*Robert Ross & Sons
384 Giles Rd.
Grafton, Ohio*

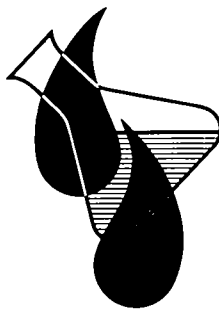
*Systems Technology Corp.
245 North Valley Rd.
Xenia, Ohio*

*Young Environmental Services, Inc.
285 Manning St.
Newark, Ohio*

4. *We have maintained accurate accounts payable records for waste removal since we purchased this company.*
- 5A. *The waste by-product that we generate in our recovery operation is identified in Item #2.*
- 5B. *Waste "bottoms" from our day to day operation have and continue to be tanked and hauled away for disposal according to legal and ecologically sound methods, i.e. incineration.*
- 5C. *Please refer to EPA Data Set EDO-464 (January 18, 1980) and EPA Data Set EDO-486 (April 4, 1980). To our knowledge the above is the only testing to date. We just recently received this information so we can neither affirm nor deny any findings.*
6. *We are not aware of any adverse health nor environmental effects from waste "bottoms" from our day to day operation. As mentioned previously these "bottoms", as described in Item #2, have always, since our ownership in 1974, been tanked and hauled away by licensed contractors for proper disposal*
7. *Currently our waste "bottoms" are handled through incineration by Robert Ross & Sons; Grafton, Ohio and Young Environmental, Newark, Ohio.*

CHEMICAL RECOVERY SYSTEMS, INC.

36345 VAN BORN ROAD
ROMULUS, MICHIGAN 48174
PHONE (313) 326-3100



142 LOCUST STREET
P. O. BOX 375
ELYRIA, OHIO 44035
PHONE (216) 323-3275

-3-

Hopefully, we have satisfied your request; however, should you desire any further information please do not hesitate to contact us.

Sincerely,

Joseph A. Heimbuch

JAH/md